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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

United States of America,
Plaintiff,

vs.

Michael Leroy Witt,
Defendant.

CR23-00389-JCH-EJM

DEFENDANT'S TRIAL BRIEF

The Defendant, Michael Leroy Witt, by and through counsel, hereby submits this Trial Brief, in accordance with the Court's Order dated January 2nd, 202 & May 7th, 2024.
[ECF Doc. 63 & 88]

I. Affirmative Defenses

The defense does not intent on presenting any affirmative defense.

II. Anticipated Evidentiary Issues

The defense does not anticipate any specific evidentiary issues, at this time. The Government submitted two motions in limine. (Doc. 103 & 104) The first one regarding the admission of material witnesses' video depositions, the defense has not objection to it. The second motion in limine regarding the introduction of defendant's prior convictions for impeachment purposes merits not response, the defendant does not intend to testify at trial.

The defense intends to argue proposed instructions submitted to the Court.

1 **III. Charts/ Summaries**

2 The defense does not intend to present any charts or summaries.

3 **RESPECTFULLY SUBMITTED:** June 14, 2024

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5 JON M. SANDS
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